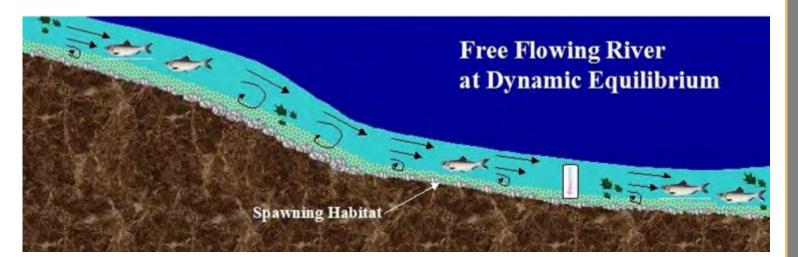


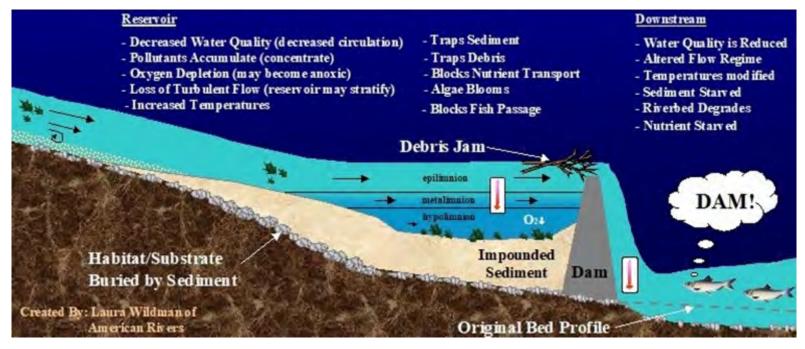




Hydropower in NH & VT: Three dams, two states, one better deal for rivers!

## Ecological Impacts of Dams







#### Federal Energy Regulatory Commission

- FERC (not a curse word!)
- Issues licenses for all non-federal hydropower projects
- License terms are 30-50 y

The Vernon Dam license was last updated in 1979 *How old were you!* 

Photo: Vernon Dam; © TNC/Eric Aldrich

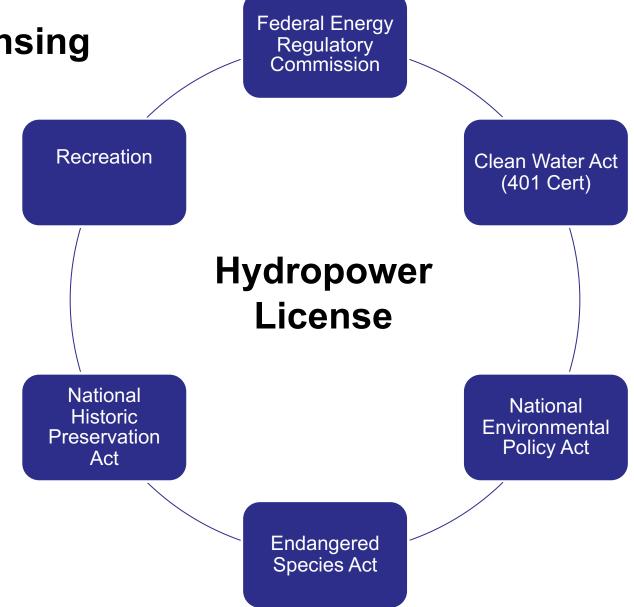


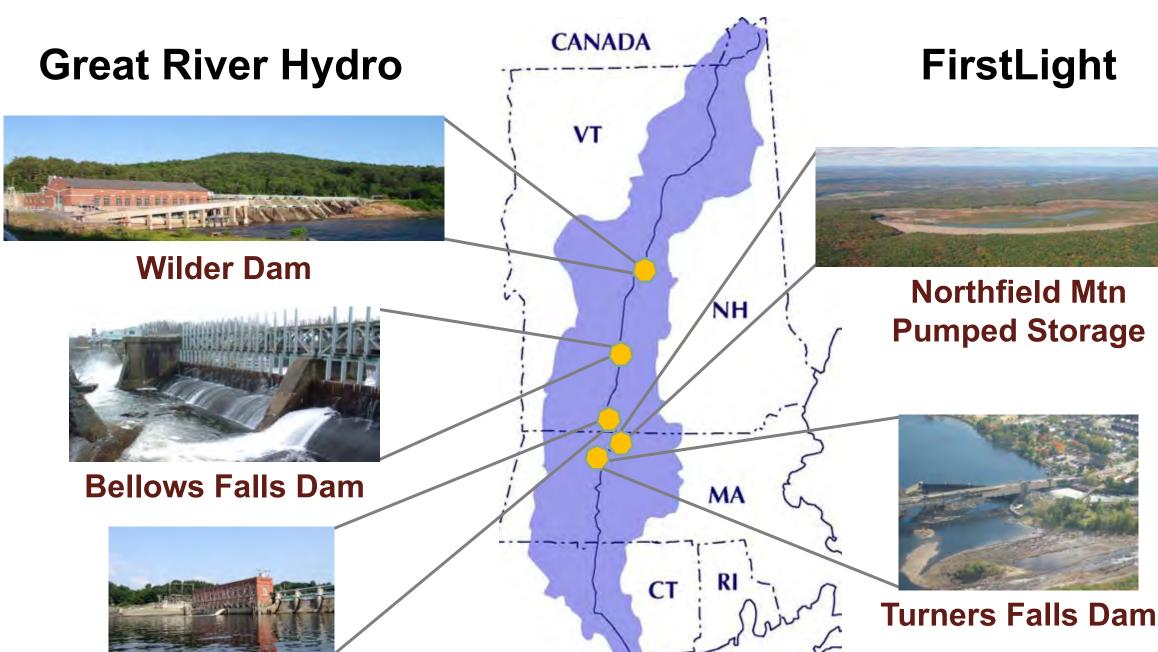
# **Federal Power Act**

- Created FERC and associated regulatory statues
- In 1986 the *"equal consideration" clause* was added; FERC is required to give "equal consideration" to:
  - power and development;
  - energy conservation;
  - protection of fish and wildlife and their habitat;
  - recreational opportunities, and
  - preservation of other aspects of environmental quality, e.g., water quality and historic preservation

#### FERC Hydropower (Re)Licensing

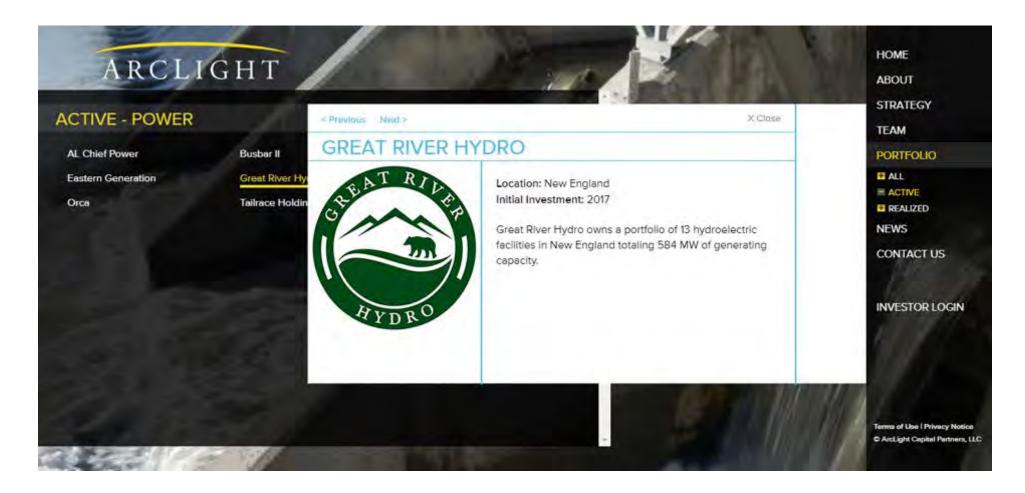
- Takes into account multiple stakeholder values ("equal consideration")
- Is a complex process integrating many different laws and regulations





**Vernon Dam** 

**Northfield Mtn Pumped Storage** 

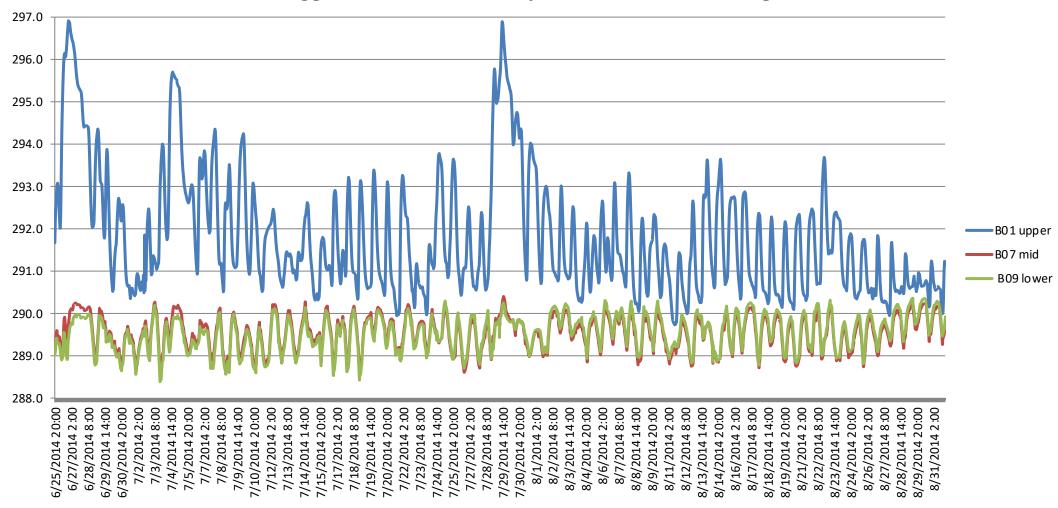


#### Great River Hydro is owned by ArcLight Capital Partners, LLC

"Founded in 2001, we helped pioneer an <u>asset-based private equity approach</u> to investing in the <u>dynamic energy sector</u>. We have <u>invested approximately \$23</u> <u>billion</u> in 110 transactions since inception, <u>generating strong realized returns</u> for our limited partners from 69 exits across diverse market cycles." (emphasis added)

# Hydro-peaking and water fluctuations

WSE loggers - Bellows Falls Impoundment June 25-Aug 31, 2014



## **Connecticut River Hydro Relicensing History**

- FERC relicensing process began October 2012:
  - Scoping
  - Studies (requests, approval, implementation, reporting)
- Several delays VT Yankee closure, 2 Gov't shut-downs, study re-dos, etc.
- Aquatic Resource Working Group pitched some ideas re: "flexibility" to GRH March 2, 2020
- GRH initiated discussions
  - Began June 4, 2020
  - Concluded November 4, 2020

# GRH Mitigation Discussions

Resource Concerns

#### Stakeholders

- Fish spawning success and movement
- Aquatic habitat availability and persistence
  - Riverine fish species
  - Cobblestone tigerbeetle (state listed)
  - Dwarf wedgemussel (federal & state listed)

#### **Great River Hydro**

- Project Economic Viability
- ISO-NE Compliance
- Operational Flexibility

## GRH Mitigation Discussions Resource Concerns NOT Covered

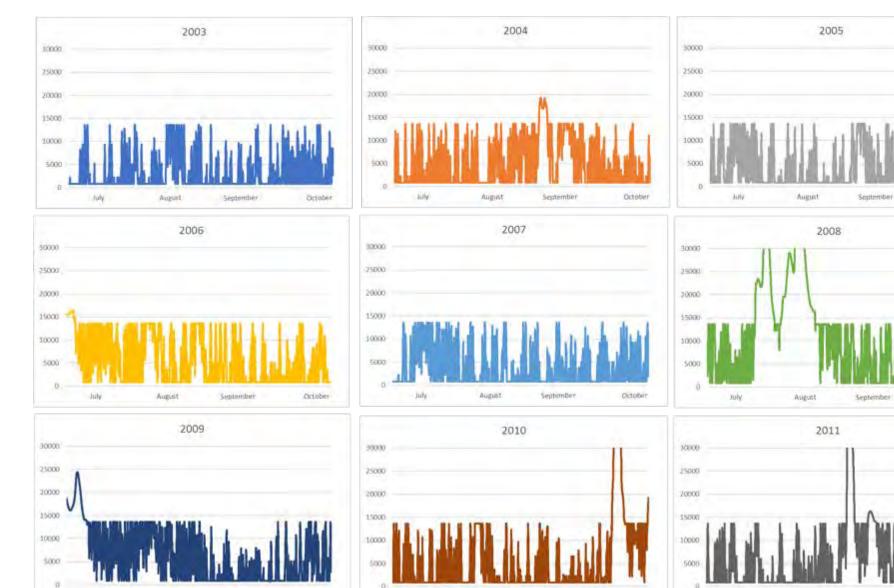
- Recreation
- Fish Passage
- Erosion
- Cultural Resources

## Modeled Current Ops, Wilder Dam, 2003-2011

-October

October

Octobe/



hity

August

September.

October

July-

August

September

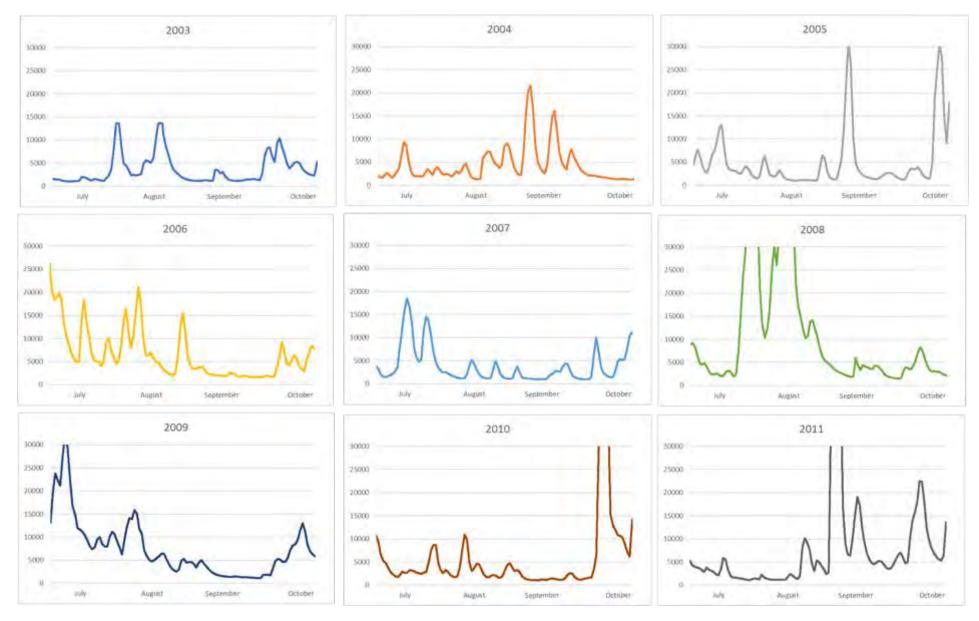
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August

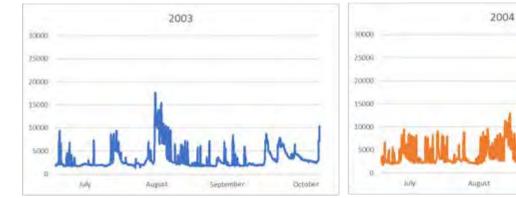
September

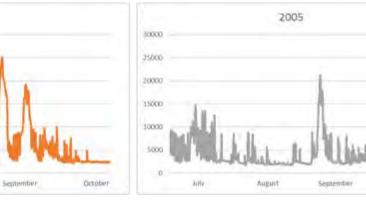
October

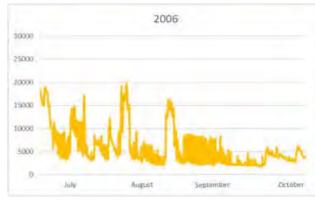
### Estimated Natural, Wilder Dam, 2003-2011

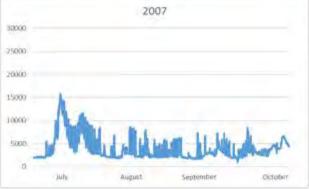


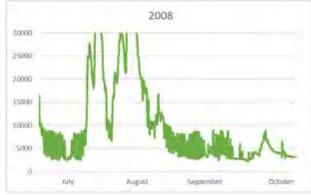
#### Modeled Inflow = Outflow, Wilder Dam, 2003-2011



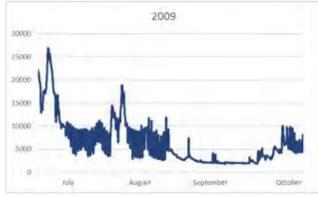


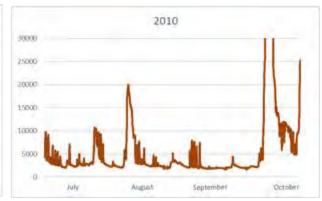


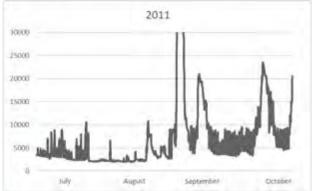




October





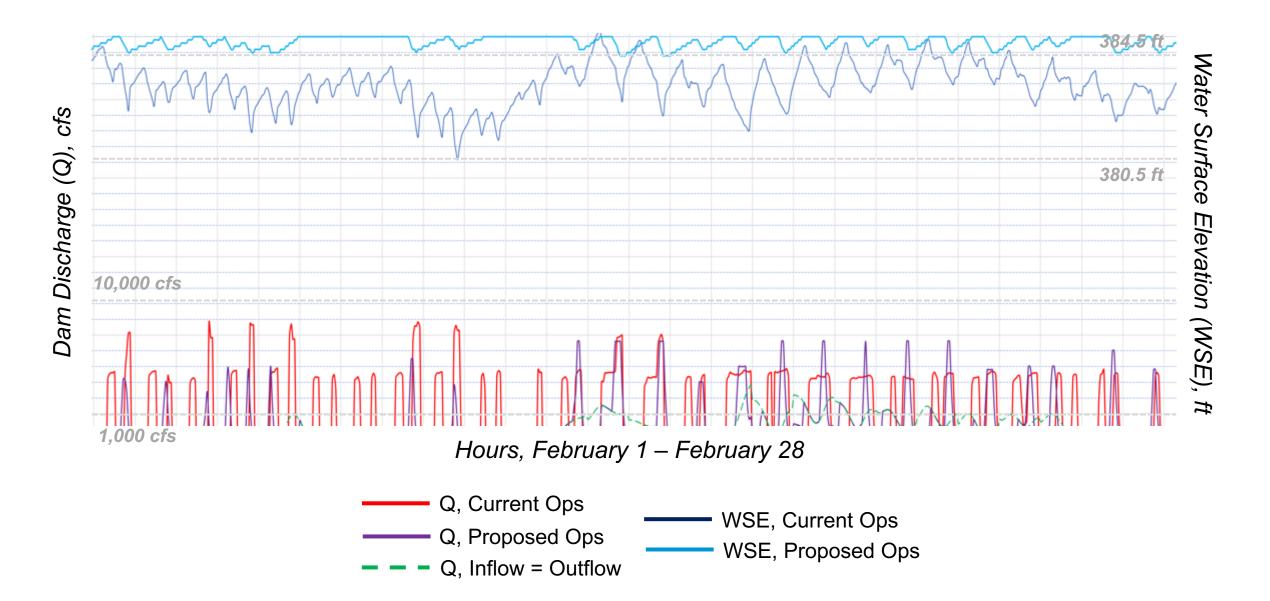


# GRH Mitigation Discussions

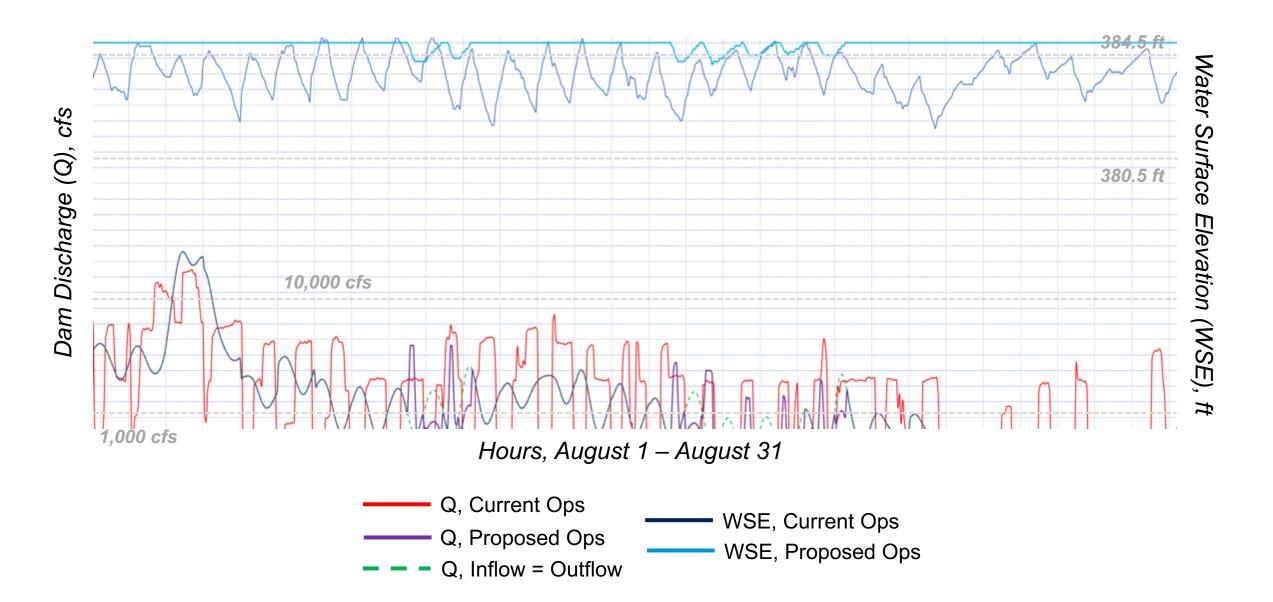
Outcomes

- Base operations are inflow = outflow
- Target WSE with 1-ft bandwidth
- Flexible hours of operation:
  - December-March: 65 hours
  - April-June: 10 hours
  - July-October: 20 hours
  - November: 42 hours
- Ramping:
  - Up-ramping: Gradual in *most* cases
  - Down-ramping: Gradual in *all* cases
- Refill impoundment w/in 48 hours after flex

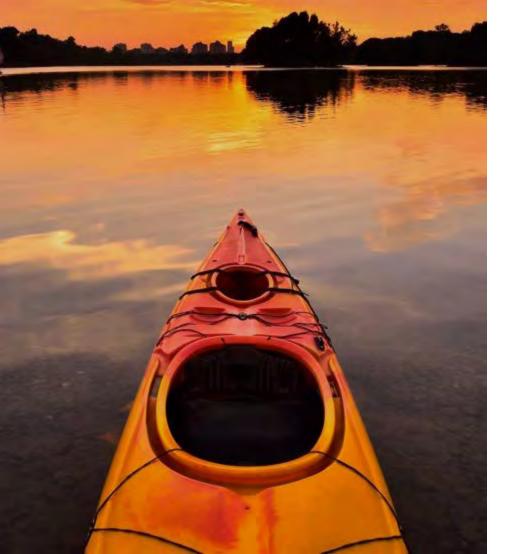
#### Simulations for illustration under new operation -Wilder February 2009 example



#### Simulations for illustration under new operation -Wilder August 2009 example



### GRH operations proposal is a win for the river...



#### Improves flows to benefit the ecosystem:

- Inflow = outflow as base ops
- Stabilized reservoir
- Increased baseflows
- Reduced fluctuations upstream and downstream
- Reduced rates of change

#### • Improves aquatic habitat:

- Increased protection of shoreline habitat
- Likely reduced erosion on upstream properties and shorelands
- Increased availability and persistence of downstream habitat

#### • Maintains energy & economic value:

- Dams maintain ability to support and respond to regional energy needs and emergencies
- Maintains company's flexibility and responsiveness to energy markets

## GRH Mitigation Discussions Resource Concerns NOT Covered

- Recreation
- Fish Passage
- Erosion
- Cultural Resources



# CRC expected significantly more protection, mitigation and enhancement measures in the license application

The application states they will provide the following mitigation:

- a. Maintain three primitive campsites
- b. Operate fish ladders from April 1 to July 15
- c. Discuss additional fish passage requirements with resource agency staff
- d. Develop and sign a Programmatic Agreement for Managing Historic Resources

# **Recreation Recommendations**

- Annual investments in recreation facilities and programs benchmarked to annual revenue.
- ✤ ADA accessible facilities.
- Improvements to all <u>portage</u> locations.
- Fund the Connecticut River Paddlers' Trail.
- Fund a <u>marketing plan</u> for the Connecticut River valley.
- Maintain, add, and improve hiking, climbing, cross-country skiing, and mountain bike <u>trails</u>.
- Maintain recreational facilities in optimal condition throughout the license term.



- Improve <u>fish viewing facilities</u> and educational programs.
- Create new <u>historical and archeological</u> interpretive programs.
- Improve <u>condition notification systems</u> for river users.

## **Safe and Effective Fish Passage**

- Improvements at Vernon Fish ladder
- Safe and effective upstream fish passage (American Eel, American Shad, Sea Lamprey)
- Protecting downstream
  migrants from turbine mortality
- Expansion of the season for resident species who migrate (white sucker and walleye)
- Appropriate passage for American Eel



## **Hydropeaking and water level fluctuations**



## **Monitoring of River Changes**



## You Are Powerful

Elected officials work for you. Business wants your mighty dollar. Friends & family look up to you.

## Use Your Power For Good For Our Rivers



# Get involved and speak up for your rivers!

- Sign up for the FERC docket
- Comment to FERC on the license application – after May
- Comment to VT and NH on the 401 Water Quality Certificate
- Comment on the Final Environmental Impact Statement

Contact us and we will help you!







## **Contact us:**

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